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U.S. Department  
of Transportation

**National Highway  
Traffic Safety  
Administration**

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# Memorandum

NHTSA 00-8572-220  
NHTSA 02-12150-

Subject: Submission to Docket 2000-8572 and  
Docket 2002-12150

Date: June 14, 2002

From: L. Robert Shelton  
Executive Director

Reply to  
Attn. of:

To: The Docket

Thru: Jacqueline Glassman  
Chief Counsel

On June 13, 2002, NHTSA Administrator Runge, Deputy Administrator Sandberg, Chief Counsel Glassman, and I met with Donald Shea, President and CEO, Rubber Manufacturers Association, and Edouard Michelin, Managing Partner and Chief Executive Officer, Michelin, as well as with several other Michelin representatives. The meeting was primarily a courtesy visit, but Mr. Shea also indicated that the Rubber Manufacturers Association was concerned that NHTSA's final rule on tire pressure monitoring systems would result in many tires being overloaded because consumers would rely on a warning light that would not be illuminated unless a tire was underinflated by 30 percent or more. Mr. Shea said that the Rubber Manufacturers Association would be filing a petition with NHTSA to require vehicles to be equipped with tires with certain reserve loads. Mr. Shea also said that the industry had concerns about the public availability of information tire manufacturers would be required to submit under NHTSA's "early warning" rule, and would file comments addressing this issue in response to the agency's recent proposed rule on confidential business information.

